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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,
Plaintiff,
v.
MICHAEL OKUN,
Defendant.

Criminal No. CR 08-0606 SI

**STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on March 27, 2009, for trial setting. The defendant was represented by Ted Cassman, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The matter was continued to June 15, 2009, at 8:30 a.m. for trial and other pretrial dates were set.

The Court made a finding that the time from and including March 27, 2009, through and including June 15, 2009, should be excluded under the Speedy Trial Act, 18 U.S.C.

§ 3161(h)(8)(A), because the ends of justice served by taking such action outweighed the best

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1 interest of the public and the defendant in a speedy trial. The finding was based on the need for
2 the defendant to have reasonable time necessary for effective preparation and for continuity of
3 counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

4 The parties hereby agree to and request that the case be continued until June 15, 2009,
5 and that the exclusion of time until then be granted. The parties agree and stipulate that the
6 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),
7 because the ends of justice served by this continuance outweigh the best interest of the public and
8 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively
9 prepare, taking into account the exercise of due diligence, and will provide for continuity of
10 counsel for the defendant.

11
12 DATED: March 30, 2009

/s/

TED CASSMAN
Counsel for Michael Okun

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15 DATED: March 30, 2009

/s/

JEFFREY R. FINIGAN
Assistant U.S. Attorney

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18 So ordered.

19 DATED:



SUSAN ILLSTON
UNITED STATES DISTRICT COURT JUDGE